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**REMARKS**

Claims 1-18 are pending in the application. Applicants respectfully submit, for reasons that will become apparent below, that the rejection of claims 1-18 under 35 U.S.C. 103(a) is erroneous, and should be withdrawn. Reconsideration of this application is respectfully requested.

Applicants and Applicants' attorney representatives wish to acknowledge with appreciation the telephone interview granted by the Office. Examiner Nguyen was kind enough to conduct the telephonic interview with Applicants' attorney representatives on April 20, 2005 in an attempt to further the prosecution of the application. In particular, Applicants discussed the section 103(a) rejection of claims 1-8 and 10-18, specifically focusing on claim 1.

Per Examiner's suggestion, claim 1 was amended merely to clarify an aspect of the invention. The amendment does not raise new issues that would require further search or consideration. Claim 1 was amended to replace a first and second text editor upon which text "may be" displayed, with a first and second text editor upon which text "is" displayed. This amendment would not require additional searching, as the amendment does not create a new search area, and any further searching should not lead to new relevant art. A search for text editors on which text "may be" displayed would require a search for text editors upon which text 1) is displayed, or 2) is not displayed. Thus, the amendment would not introduce a new feature that would require a new search.

Furthermore, claim 1 was amended to replace "a screen" with "a first screen" to improve the consistency of claim language. Thus, this amendment also does not raise issues that would require further search or consideration.

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The Office Action rejects claims 1-8 and 10-18 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,727,894 by Karidis et al., hereinafter "Karidis", in view of U.S. Patent No. 6,396,598 by Kashiwagi et al., hereinafter "Kashiwagi". Applicants respectfully traverse the rejection on the grounds that the combination of Karidis and Kashiwagi fails to disclose or suggest all of the features of independent claims 1, 10 and 15.

Claim 1 provides for a text processing apparatus. The text processing apparatus includes a first text editing unit having a screen upon which text is displayed, and a first manual actuator by means of which a user is able to interact with text displayed on the first screen. Also included is a second text editing unit having a second screen upon which text is displayed, and a second manual actuator by means of which a user is able to interact with text displayed on the second screen. The first and second actuators are independently operable, and enable interaction with text displayed on respective screens independently of each other. The first and second text editing units are connected to each other to enable text to be imported from one unit directly to another unit, thereby to enable text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit.

Applicants believe that an agreement was reached in the above telephone interview, specifically that Karidis does not disclose the following features of claim 1 as amended pursuant to Examiner's suggestion:

**"a first text editing unit having a screen upon which text is displayed, and a first manual actuator by means of which a user is able to interact with text displayed on the first screen;  
a second text editing unit having a second screen upon which text is displayed, and a second manual actuator by means of which a user is able to interact with text displayed on the second screen;"**

as recited in claim 1.

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The Office Action discusses Karidis, particularly citing the abstract, col. 5, line 58 – col. 7, line 7 (Figs. 1-4), col. 12, lines 18-28 (Fig. 1). The Office Action also cites the abstract, col. 7, lines 33-45 (Figs. 1-6), col. 9, lines 51-63, and Figs. 1, 5-6 and 10.

As shown at least in Figs. 1-10, Karidis discloses a computing device 100, which Examiner equates with a “first text editing unit”, and a display 202, which Examiner equates with “a screen”. As shown particularly in Figs. 3 and 5, Karidis discloses computing device 100 having display 202, keyboard 204 and recording unit 101. Recording unit 101, which Examiner erroneously equates with a “second text editing unit”, includes a markable surface 150, and a display 108 which appears to be equated with a “second screen” in the Office Action. Examiner also equated markable surface 150 with a “second screen” in the above-mentioned interview. The handwriting recording unit, markable surface and stylus provide a second user interface to a processor (col. 2, lines 34-36).

Display 108 is, for example, an LCD, and can provide prompts for, and/or communicate information to, a user (col. 8, lines 61-63). Although display 108 includes text, there is no component that allows a user to interact with or edit text in display 108.

Markable surface 150 is also not a second screen as provided in claim 1, because there is no capability for interacting with or editing text displayed on markable surface 150. Markable surface 150 simply provides an input for handwriting into computing device 100 and displayed on display 202. A stylus 152 is disclosed for engagement with markable surface 150 (col. 7, line 65 – col. 8, line 3), to convey information to the recording unit (col. 2, lines 28-33). Markable surface 150 is superimposed over a working surface 103, and may be laid atop working surface 103 (col. 7, lines 19-24). In another example, markable surface 150 might be a top sheet, or an intermediate sheet, of a number of sheets such as a pad 160 shown in Figs. 10 and 11 (col. 7, lines 24-26). However, markable surface 150 is not a screen that allows a user to interact with text displayed thereon. Handwritten markings made via Stylus 152

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may remain on markable surface 150, however, there is no capability to interact with or edit those markings or with text located on markable surface 150. Handwritten text or drawings can only be added to markable surface 150, and thus a user cannot interact with the markings. Thus, there is no teaching of an ability to interact with or edit text displayed on recording unit 101. Therefore, Karidis does not teach a second text editor, nor does Karidis teach a second text editor having a second screen as recited in claim 1.

Karidis fails to disclose a **second text editing unit having a second screen** that can display text, wherein a user can **interact with text displayed on the second screen**. Therefore, Karidis does not disclose or suggest "a second text editing unit having a second screen upon which text is displayed, and a second manual actuator by means of which a user is able to interact with text displayed on the second screen," as recited in claim 1. Nor does Karidis disclose or suggest inserting the edited text from the second text editor at a predetermined location in a document displayed on the first editor

Applicants also wish to reiterate that Kashiwagi does not disclose a **second text editing unit**, or a second text editing unit having a **second screen upon which text is displayed**, and a second manual actuator by means of which a user is able to **interact with text displayed on the second screen**, as recited in claim 1. Also, Applicants wish to reiterate the argument that neither Karidis nor Kashiwagi disclose enabling text **selected** from a first document displayed on one unit to be inserted directly at a **predetermined location** in a document displayed on the other unit.

The Office Action discusses Kashiwagi, particularly citing col. 16, line 36 – col. 20, line 28 and col. 27, lines 26-36, which section disclose embodiments 1-4 and 7. Each of embodiments 1-4 and 7 are discussed as follows.

The first embodiment of Kashiwagi (col. 10 – 17, Figs. 1 – 4) is an electronic memo processing apparatus 50 (col. 10, line 41) including a see-through display device

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68 and a transparent tablet 66 stacked on see-through display device 68 (col. 10, lines 57 - 62). The first embodiment discloses a display of only one document on **one screen**, i.e., on see-through display device 68. As shown in Figs. 3-4, apparatus 50 is placed on a document 52 on a paper medium, and an electronic memo 72 is written on tablet 66 and displayed on see-through display device 68.

The second embodiment (col. 17, Fig. 15) is an apparatus 250 including a see-through display device 256 and a tablet 260 (col. 17, lines 55 - 65). The second embodiment discloses a display of only one document on **one screen**, i.e., on see-through display device 256. Also, because there is no teaching of an ability to interact with or edit text displayed on display device 256 or edit markings or text applied to display device 256, apparatus 250 is not a text editing unit as recited in claim 1.

The third embodiment (col. 18, Fig. 17) is a system 270 includes a monitor device 274 having a document 290 displayed thereon, and a tablet 282 and a pen 284 (col. 18, lines 50 - 57). The third embodiment is similar to the first or second embodiment, except that the display device is a monitor device 274 on which document 290 is displayed (col. 18, line 66 - col. 19, line 2). The third embodiment discloses a display of only one document on **one screen**, i.e., on monitor device 274. In addition, even if in one embodiment provides an input where document 290 is displayed on tablet 282, such input display, i.e., tablet 282 and pen 284, is not independently operable as provided in claim 1.

As with Karidis, the electronic memo processing apparatus is simply an input medium that records and **displays stylus data**. Because there is no ability to edit markings or text displayed on either a document or the display device, the apparatus is not a text editing unit as provided in claim 1. Also, there is no teaching of an ability to interact with or edit text displayed on the display device. Regarding the third embodiment, although a document is displayed on a screen, there is no teaching of a second text editing unit having a display for editing text displayed on that screen.

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Furthermore, as discussed above, the apparatus includes only a single screen as provided in claim 1. Lastly, as there is no ability to interact with or edit text displayed, there is also no ability to select text displayed on the display device for insertion into another text editing unit, as provided in claim 1.

The fourth embodiment (col. 19, Figs. 18 and 20) discloses a portable computer 300 including an electronic memo processing apparatus 330 (col. 19, lines 54 - 57). Electronic processing apparatus 330 includes a display unit 364 (col. 20, lines 6 - 28). The fourth embodiment discloses a display of only one document on one screen, i.e., on display unit 364. The Examiner, on page 4 of the Office Action, equates an electronic memo processing apparatus with "a text editing unit", and equates computer 300 with "another text editing unit". However, contrary to the Office Action's interpretation, Kashiwagi explicitly discloses "a portable computer 300, which is an electronic memo processing apparatus in accordance with the fourth embodiment of the present invention." (col. 19, lines 17-19) Therefore, this embodiment discloses a single apparatus, and thus the fourth embodiment does not teach two separate text editing units. It appeared during the above-mentioned interview that Examiner equated the electronic memo processing apparatus 50 with "a text editing unit" and computer 300 with "another text editing unit". Applicants submit that such a combination is incorrect and not supported by Kashiwagi. Kashiwagi separately describes the numbered embodiments discussed herein, describes them as distinct embodiments of an electronic memo processing apparatus, and provides no teaching or implication that any embodiments could be combined.

The seventh embodiment (col. 26, Fig. 34) is similar to the fourth embodiment (col. 26, lines 18 - 20). Therefore, the seventh embodiment discloses a display of only one document on one screen, i.e., on display unit 364.

As discussed above, the above embodiments merely disclose an input medium for recording and displaying stylus data. The markings made with a stylus may be added to the display device or display unit, however there is no ability to edit markings or text

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on the display device. Therefore, the electronic memo processing apparatus is not a text editing unit as provided in claim 1. Also, as discussed above, the apparatus includes only a single screen upon which text can be displayed, and further does not provide a second screen upon which text displayed thereon can be interacted with. Further, there is no teaching of an ability to interact with or edit text displayed on the display device, and there is also no ability to select text displayed on the display device for insertion into another text editing unit, as provided in claim 1.

Therefore, Kashiwagi fails to disclose **"a second text editing unit having a second screen upon which text is displayed, and a second manual actuator by means of which a user is able to interact with text displayed on the second screen; wherein the first and second actuators are independently operable, and enable interaction with text displayed on respective screens independently of each other; and the first and second text editing units are connected to each other to enable text to be imported from one unit directly to another unit, thereby to enable text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit,"** as recited in claim 1. Thus, Karidis and Kashiwagi, whether considered independently or in combination, fail to disclose or suggest the elements of claim 1. It is important to note that neither Karidis nor Kashiwagi, either alone or in combination, disclose or suggest a device or method whereby text is edited via one text editor and then **"inserted directly at a predetermined location in a document displayed on the other unit."**

Applicants also wish to reiterate that there is no motivation to combine the teachings of Karidis and Kashiwagi. Karidis simply provides a laptop computer having two inputs, a keyboard and a stylus, wherein only the keyboard display allows a user to interact with text displayed thereon. The stylus does not disclose or suggest an editing of text. Kashiwagi only provides a device for superimposing inputs from a stylus on a document. There is no reason to combine the two, as neither Kashiwagi nor Karidis provide motivation for adding a second screen for interaction with text displayed thereon. Furthermore, the Examiner has not provided any evidence in the art of a

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motivation to combine Karidis and Kashiwagi. Even if one were motivated to combine these references, the only teaching would be to replace one stylus with another stylus.

Karidis discloses input being provided via recording unit 101 or keyboard 204 for display and interaction with text on a single screen 202. Karidis **does not suggest any need or benefit of having a second screen with which a user can interact.** In Kashiwagi, (i) all of the embodiments provide for input being provided via a tablet, and display only one document on one screen, and (ii) for embodiment three the document is displayed only on one screen, i.e., monitor device 274, the Kashiwagi et al. patent **does not suggest any need or benefit of having a second screen with which a user can interact.** To the contrary, the Kashiwagi et al. patent, embodiment three, which employs an external monitor, i.e., monitor device 274, is expressly described as displaying only one document on one screen, i.e., on monitor device 274. Therefore, there is **no suggestion or motivation** in either of the Karidis et al. or Kashiwagi et al. patents to be combined with one another.

Thus, there is no evidence that it would have been obvious at the time the invention was made to a person having ordinary skill in the art to combine Karidis and Kashiwagi. Examiner indicated that neither Karidis nor Kashiwagi explicitly provided a motivation to combine, but that it would have been obvious based on Examiner's experience. However, Examiner is not considered a person having ordinary skill in the art, and Examiner has provided no evidence of a motivation to combine Karidis and Kashiwagi. Nor has the Examiner clearly set forth what elements could be combined to suggest or describe that which is recited in the present claims.

Therefore, Karidis and Kashiwagi, whether considered independently or in combination, do not disclose or suggest the elements of claim 1. Also, there is no motivation to combine the teachings of Karidis and Kashiwagi. Therefore, claim 1 is patentable over the cited combination of Karidis and Kashiwagi.



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Independent claims 10 and 15 include recitals similar to claim 1. Therefore, for reasoning similar to that provided in support of claim 1, claims 10 and 15 are patentable over the cited combination of Karidis and Kashiwagi.

Claims 2-8 depend from claim 1, claims 11-14 depend from claim 10, and claims 16-18 depend from claim 15. By virtue of these dependencies, claims 2-8, 11-14 and 16-18 are also patentable over the cited combination of Karidis and Kashiwagi.

For the reasons set forth above, it is submitted that the rejection of claims 1-8 and 10-18 under 35 U.S.C. 102(b) as anticipated by Bowen is erroneous. Applicants respectfully request that the rejection of claims 1-8 and 10-18 be withdrawn.

Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over Karidis and Kashiwagi and further in view of U.S. Patent No. 6,704,024 by Robotham et al., hereinafter "Robotham". Applicants traverse this rejection.

Applicants do not believe that Robotham makes up for the deficiencies of Karidis and Kashiwagi, as they apply to claim 1. Accordingly, Applicants submit that claim 1 and claim 9, by virtue of its dependence, are both patentable over the cited combination of Karidis, Kashiwagi and Robotham. Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claim 9.

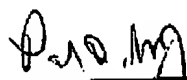
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An indication of the allowability of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully Submitted,

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